

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

VICTIM RIGHTS LAW CENTER, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION,
et al.,

Defendants.

Case No. 1:25-cv-11042-MJJ

MOTION TO DISMISS

Defendants hereby move to dismiss this lawsuit for lack of subject matter jurisdiction and for failure to state a claim upon which relief can be granted pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure. The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is also attached.

Dated: July 28, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

ERIC J. HAMILTON
Deputy Assistant Attorney General

/s/ Brad P. Rosenberg
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CERTIFICATE OF SERVICE AND RULE 7.1 CERTIFICATION

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants.

Pursuant to Local Rule 7.1(a)(2), counsel conferred regarding this motion but were unable to resolve or narrow the issue presented by the motion.

Dated: July 28, 2025

/s/ Brad P. Rosenberg
BRAD P. ROSENBERG
Special Counsel